

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

JULIA HUBBARD and KAYLA  
GOEDINGHAUS,

Plaintiffs,

v.

TRAMMELL S. CROW, JR.; BENJAMIN  
TODD ELLER; RICHARD HUBBARD;  
MELISSA MILLER; SCOTT WOODS;  
COE JURACEK; PHILIP ECOB;  
CODY MITCHELL; RALPH ROGERS;  
ROBERT PRUITT; SCOTT BRUNSON;  
CASE GROVER; MICHAEL  
HYNES, JR.; SHAWN MAYER; JADE  
MAYER; AARON BURLINGAME; and RCI  
HOSPITALITY HOLDINGS, INC.,

Defendants.

Case No. SA-23-CA-580-FB

Judge: Hon. Fred Biery  
Date Action Filed: May 8, 2023  
(transferred)

**DECLARATION OF JULIA HUBBARD**

1. I, Julia Hubbard, am the Plaintiff in this action and declare the following under penalty of perjury under 18 U.S.C. § 1746.

2. Based on my personal knowledge, Defendant Rick Hubbard has two active Facebook accounts, accessible at <https://www.facebook.com/profile.php?id=61552262523303> and <https://www.facebook.com/profile.php?id=100090753525747>. I have reviewed both of these accounts and they contain photos and other identifying information of Mr. Hubbard.

3. I viewed both of these accounts today, March 5, 2024, and confirmed that Mr. Hubbard last posed to the first account, <https://www.facebook.com/profile.php?id=61552262523303>, on

January 13, 2024, when he modified his profile photo. The second account, <https://www.facebook.com/profile.php?id=100090753525747>, also showed recent activity, in November 2023.

4. Based on my review of these accounts and their activity, I believe that these are effective means to contact Rick Hubbard.

I declare under penalty of perjury under the laws of the United States of American that the foregoing is true and correct.

Executed on March 5, 2024

/s/ Julia Hubbard  
Julia Hubbard